

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Victor Campbell, on behalf of himself and others similarly
situated,

Plaintiff,

-against-

City of New York; and NYPD Officers John Does #1-4,
true names being presently unknown,

Defendants.

Case No. 1:21-cv-04056-JLR

NOTICE OF MOTION

PLEASE TAKE NOTICE, that pursuant to Local Civil Rule 1.4, Mohammed Gangat, Esq. and Joshua Nessen, Esq., move this Court for an Order granting permission to withdraw as counsel to plaintiff Victor Campbell (“Plaintiff”) in this action. The reason for this request is due to Plaintiff’s lack of communication with counsel. The details of these issues are set forth in the accompanying Declaration of Mohammed Gangat, Esq., dated November 2, 2022, and submitted Support of Motion to Withdraw. In conjunction with this application, Mr. Gangat and Mr. Nessen also request a 60-day stay, if the request to be relieved is granted, to allow Plaintiff sufficient time to retain new counsel.

Mr. Gangat and Mr. Nessen are not asserting a retaining lien or a charging lien.

WHEREFORE, Mr. Gangat and Mr. Nessen respectfully request that this Motion be granted in its entirety, and for such order and further relief as the Court may deem just and proper.

Dated: December 1, 2022
New York, NY

Respectfully Submitted,
LAW OFFICE OF MOHAMMED GANGAT



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